

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re:

**Lawrence Meyerhofer
Debtor.**

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CASE NO. 19-10258-mdc

Chief Judge Magdeline D. Coleman

**NOTICE OF DEBTOR’S REQUEST FOR FORBEARANCE DUE TO THE COVID-19
PANDEMIC**

Now comes Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing (“Creditor”), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor’s request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 10/01/2020 through 12/01/2020. Creditor holds a secured interest in real property commonly known as 2485 Hieter, Quakertown, PA 18951 as evidenced by claim number 8-1 on the court’s claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 01/01/2021 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Authorized Agent for Secured Creditor

130 Clinton Rd #202,

Fairfield, NJ 07004

Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab

Charles G. Wohlrab, Esq.

E-mail: cwohlab@raslg.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May, 6, 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

**Lawrence Meyerhofer
2485 Hieter
Quakertown, PA 18951**

And via electronic mail to:

**Brad J. Sadek
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107**

**William C. Miller, Esq.
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105**

**United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106**

**Robertson, Anschutz, Schneid, Crane &
Partners, PLLC**

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